

KAMALA D. HARRIS  
Attorney General of California  
MARK BRECKLER  
Chief Assistant Attorney General  
KATHLEEN FOOTE  
Senior Assistant Attorney General  
EMILIO VARANINI  
Deputy Attorney General  
State Bar No. 163952  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 703-5908  
Fax: (415) 703-5480  
E-mail: [Emilio.Varanini@doj.ca.gov](mailto:Emilio.Varanini@doj.ca.gov)

*Attorneys for State of California, et al.*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,**

Master File No. 3:07-cv-05944-SC

MDL No. 1917

**DECLARATION OF EMILIO E.  
VARANINI IN SUPPORT OF THE  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

**This Document Relates To:**

**ALL ACTIONS**

1. I am a Deputy Attorney General with the California Attorney General's Office and am lead counsel for the California Attorney General in the state court case of *State of California et. al. v. Samsung SDI, Co., Ltd.*, Case No. 11-51584 (California Superior Court, San Francisco). This case has been coordinated with this Court's MDL No. 1917 for purposes of fact and expert discovery as well as mediation and settlement. I am admitted to this Court and could, if called as a witness, testify competently to the matters set forth herein. I make this declaration under penalty of perjury under the laws of the United States and the State of California.

1           2.     Portions of the Administrative Motion for Order Issuing the Revised Letters of  
2     Request for the Taking of Evidence from Woong Tae (W.T.) Kim and Myung Joon (M.J.) Kim  
3     and of the Declaration of Emilio E. Varanini in Support of that Motion, as well the entirety of the  
4     two Revised Letters of Request itself (including the Korean translations of those letters) and the  
5     supporting questions and documents, refer to confidential information from two sources. The  
6     first source is information received from Defendant LG pursuant to a settlement agreement that it  
7     has with the Attorney General, including the personal address of two witnesses from whom the  
8     Attorney General seeks the taking of evidence. The second source are documents produced in  
9     this case and marked as confidential.

10           3.     Specifically, page 3:26-28, 4:1-3 of the Declaration of Emilio E. Varanini in support  
11     of that motion and the Revised Letters of Request, including the attached questions and  
12     documents, all contain this confidential information. This confidential information has been  
13     submitted in support of a non-dispositive motion.

14           4.     The references to confidential information provided to the Attorney General by  
15     Defendant LG, such as the personal address of the witnesses from whom the Attorney General  
16     seeks the taking of evidence, concern information provided to the Attorney General pursuant to  
17     the settlement agreement entered into between those two parties.

18           5.     While only portions of the motion and declaration referenced above were filed under  
19     seal, the Attorney General has filed under seal the Revised Letters of Request and their Korean  
20     translations, along with the attached questions and their Korean translations, and attached  
21     documents.

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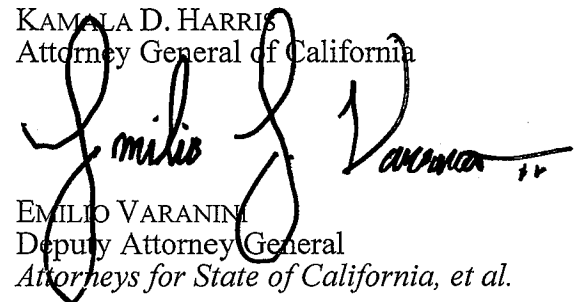
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1 The Attorney General believes that it is not practical for only portions of these documents  
2 to be filed under seal given the extensive reference to confidential information throughout the  
3 entirety of these documents.

4 Dated: September 4, 2014

Respectfully submitted,

5 KAMALA D. HARRIS  
6 Attorney General of California

7  *Emilio Varanini*  
8 EMILIO VARANINI  
9 Deputy Attorney General  
Attorneys for State of California, et al.

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